

# Illinois School for the Visually Impaired

658 East State Street • Jacksonville, Illinois 62650

Voice 217-479-4400 • TTY 217-479-4415 • 1-800-919-5617 • Fax 217-479-4507

*Operated by the Illinois Department of Human Services, Division of Rehabilitation Services.*

*Accredited by the North Central Association of Colleges and Schools.*



October 16, 2008

Received & Inspected

OCT 23 2008

FCC Mail Room

**CC Docket No. 96-45**

**CC Docket No. 02-6**

Illinois School for the Visually Impaired

BEN: 73153

Form 471 #: 619896

SPIN: 143004812 - SBC Datacomm, Inc.

SERVICE TYPE: Internal Connection

Funding Year: 2008 (July 1, 2008 – June 30, 2009)

FCDL Date: 7/16/2008

FRN: 152587

ISVI Contact Person: Brenda Stewart

Brenda.J.Stewart@illinois.gov

217/479-4428

## WAIVER REQUEST

At the Illinois School for the Visually Impaired (ISVI) among numerous other duties, I serve as the contact person for ISVI's E-rate grant proposals--of which we currently have three individual funding-year proposals underway.

When I received the FCDL on 7/16/08, I quite honestly did not pay close enough attention to the amount, but only noted the term, "approved." It was not until late on September 29, 2008 that I actually realized the amount approved was not the amount we had proposed. At that same time, I realized I was 13 days past the deadline date to file an appeal with USAC. On September 30, I quickly sent an e-mail to Mr. Paul Stankus, Ombudsman Program Manager with USAC, inquiring if it would even be practical to submit an appeal to USAC, knowing ISVI was beyond the 60-day window. "Attachment #1" is my e-mail to Mr. Stankus and his response back to me as to my reason for requesting a waiver for the 60-day limit to the appeals process.

The discrepancy in the funding amount approved by USAC and ISVI's submitted proposal appears to clearly be a data-entry error on USAC's part; placing a decimal point in the wrong location, which would explain the reason for the funding commitment amount being gravely less than what ISVI requested in our revised Item 21 Attachment that was sent to Ms. Cromie. In her e-mail response back to me, she acknowledges that she submitted the application successfully for ISVI.

Therefore, please look further into the attached documentation to substantiate this claim and give consideration for a review of USAC's funding commitment decision.

No. of Copies rec'd 0  
List ABCDE

Illinois School for the Visually Impaired  
October 16, 2008

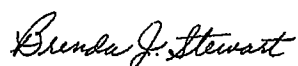
### REQUEST FOR REVIEW

For the year 2008, ISVI submitted the Form 471 and Item 21 Attachments successfully. On 2/29/08, I received an e-mail from Donna Cromie from Program Integrity Assurance, Schools & Libraries Division of USAC. She contacted me over some issues in the Item 21 Attachment I had submitted on behalf of ISVI. In going through my records very carefully, I did recognize the errors brought to my attention by Ms. Cromie. I e-mailed Ms. Cromie with several communications, questions, etc. As a result, on 3/21/08 I e-mailed Ms. Cromie with a pdf attachment of a revised Item 21 Attachment, asking that she adjust ISVI's FRN to the amount shown in the e-mail attachment as a correction. The enclosed "Attachment #2" is the same file I attached to my e-mail as a correction, sent to Ms. Cromie. Additionally, "Attachment #3" is a file from the web site "E-Rate Central" showing the history and dollar amounts pertaining to ISVI's application request for E-rate funding. I am requesting that the attached documentation be reviewed within this Request for Review.

In looking at the third and last page of Attachment #2; the Project Grand Total is **\$195,011.60**. I believe either Ms. Cromie or someone on behalf of USAC incorrectly put in that ISVI was requesting only **\$19,501.16**. This very clearly appears to be a simple error made by USAC that certainly would be very costly for ISVI. Essentially, with the cost of our proposed telecom project, the Illinois School for the Visually Impaired cannot begin to initiate this project without the full funding of the amount we submitted to USAC as shown in the revised Item 21 Attachment of 3/21/08.

I wish to respectfully request that the Federal Communications Commission review ISVI's project proposal, documentation provided with this letter, and related forms submitted earlier for the 2008 funding year. Certainly if I can answer any questions or provide additional information, please contact me at such time as well as with any communication regarding this request for review to amend USAC's funding amount.

Sincerely,



Brenda Stewart  
Technology Specialist  
Illinois School for the Visually Impaired

Enclosures 3

---

*The mission of the Illinois School for the Visually Impaired is to serve as a statewide resource offering students with visual impairments quality services which will enable them to become personally productive and self-sufficient citizens.*

---

# **Attachment #1**

10/03/2008 11:39 a.m.

From: "Paul Stankus" <[pstankus@usac.org](mailto:pstankus@usac.org)>  
To: "Brenda Stewart" <[Brenda.J.Stewart@illinois.gov](mailto:Brenda.J.Stewart@illinois.gov)>  
CC: "Robert Spiller" <[rspiller@usac.org](mailto:rspiller@usac.org)>  
Subject: RE: RE: Erate 7Day App#619896 ILLINOIS SCHOOL FORTHEVISUALIMPAIRED

Dear Ms Stewart,

Thank you for your inquiry to the ombudsman office. I took a look at your documentation and compared it to what we have in our files. It does appear that the item 21 attachment you sent in asked for the one time charge of \$195,011.60, and that the one time charge was reduced to \$19,501.16.

Unfortunately, as you have already surmised, you notified us of the error on 9/30/2008 -- which is after the 60 days from the FCDL date of 7/16/2008 and is beyond the date to appeal the decision to USAC. The deadline for submitting an appeal on the funding decision would have been 9/15/2008. Your only option would be to request a waiver from the FCC to accept your appeal as timely filed.

I wish I could help you more with this case, but our hands are tied in this matter. Only the FCC has the authority to waive program rules.

Good luck filing your waiver request with the FCC.

Sincerely,

Paul Stankus

\*\*\*\*\*

Paul Stankus, PMP  
Ombudsman Program Manager  
USAC  
2000 L St. NW Suite 200  
Washington, DC 20036

Phone:(202) 776-0200 x1618  
Fax: (202) 776-0080  
email: [pstankus@usac.org](mailto:pstankus@usac.org)

CONFIDENTIALITY: This e-mail and any attachments are confidential and also may be privileged. If you are not the named recipient, or have otherwise received this communication in error, please delete it from your inbox, notify the sender immediately, and do not disclose its contents to any other person, use them for any purpose, or store or copy them in any medium.

Thank you for your cooperation.

\*\*\*\*\*

-----Original Message-----

From: Brenda Stewart [<mailto:Brenda.J.Stewart@illinois.gov>]

Sent: Tuesday, September 30, 2008 5:44 PM

To: Paul Stankus

Subject: Fwd: RE: Erate 7Day App#619896 ILLINOIS SCHOOLFORTHEVISUALIMPAIRED

Good afternoon Mr. Stankus,

Yesterday was the first time I realized that our application to USAC for E-rate was not at the rate or amount we had submitted for our internal connection--telecom renovation project we were proposing to do with E-rate assistance.

When receiving our Funding Commitment Decision Letter, I merely checked for the correct application number--619896 and the word, "approved". As I said, I did not realized until yesterday that the amount approved was for only \$22,788.83 rather than \$195,011.60 that we had submitted. As you will see in my e-mail to Donna Cromie, I asked her to correct our FRN to the amount shown in the attached pdf file. I'm also attaching the information reflected on the E-Rate Central Web site pertaining to our particular FRN.

It very much looks as though the major discrepancy comes from a data entry error on the part of PIA. In the Funding Decision Letter, the Annual Pre--discount Amount for Eligible Non-recurring Charges is \$19,501.16. If you look at the total unit cost--last page of my pdf attachment, it is in the amount of \$195,011.60; I believe an error was certainly made when data was entered by PIA and/or USAC on behalf of the Illinois School for the Visually Impaired.

I duly realize, Mr. Stankus, that I am 14 days beyond my opportunity to appeal this decision on behalf of ISVI however, it is not an error on my calculations and could easily have been made by person(s) entering data on behalf of USAC.

Is there any way you would be able to look further into this matter as to whether an appeal could reasonably resolve the matter or if this problem could be resolved with no appeal necessary so we might still be able to proceed with our project? I am most distressed with myself for the oversight of the dollar value in the Decision Letter, but do feel hopeful since it was not an error on my part that it can be easily resolved.

Thank you for your attention to my problem as I am most hopeful you can offer a reasonable solution.

MY COMMUNICATION TO DONNA CROMIE IS PROVIDED BELOW:

Brenda Stewart  
Technology Specialist  
LAN & RAC-F Coordinator

Illinois School for the Visually Impaired  
658 East State Street  
Jacksonville, IL 62650  
[brenda.j.stewart@illinois.gov](mailto:brenda.j.stewart@illinois.gov)  
Web Site: [www.isvi.net](http://www.isvi.net)  
(217) 479-4428  
TTY: (217) 479-4415  
FAX 217.479.4412  
WCS #: 444-72-001-XB-1

CONFIDENTIALITY NOTICE:

The content in this e-mail and any files or attachments transmitted with it are confidential and may be protected by legal privilege. This e-mail is intended for the use of the individual or entity to whom this e-mail is addressed. If you are not the intended recipient of this e-mail, you are hereby notified any use, dissemination, distribution or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately by e-mail and delete this e-mail from your system.

>>> "Cromie, Donna" <[DCROMIE@solixinc.com](mailto:DCROMIE@solixinc.com)> 3/21/2008 3:10 PM >>>  
It was my pleasure

Donna M. Cromie  
Program Integrity Assurance  
Schools & Libraries Division  
Universal Service Administrative Company  
Phone: 973-581-5042  
Fax: 973-599-6522  
Email: [DCromie@sl.universalservice.org](mailto:DCromie@sl.universalservice.org)

-----Original Message-----

From: Brenda Stewart [<mailto:Brenda.J.Stewart@illinois.gov>]  
Sent: Friday, March 21, 2008 3:58 PM  
To: Cromie, Donna  
Subject: RE: Erate 7Day App#619896 ILLINOIS SCHOOL FOR THEVISUALIMPAIRED

Thank you so much for letting me know. It was very pleasant working with you and thank you so very much for all your help and support!

Brenda Stewart  
Technology Specialist  
LAN & RAC-F Coordinator  
Illinois School for the Visually Impaired  
658 East State Street  
Jacksonville, IL 62650  
[brenda.j.stewart@illinois.gov](mailto:brenda.j.stewart@illinois.gov)  
Web Site: [www.isvi.net](http://www.isvi.net)

(217) 479-4428  
TTY: (217) 479-4415  
FAX 217.479.4412  
WCS #: 444-72-001-XB-1

CONFIDENTIALITY NOTICE:

The content in this e-mail and any files or attachments transmitted with it are confidential and may be protected by legal privilege. This e-mail is intended for the use of the individual or entity to whom this e-mail is addressed. If you are not the intended recipient of this e-mail, you are hereby notified any use, dissemination, distribution or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately by e-mail and delete this e-mail from your system.

>>> "Cromie, Donna" <[DCROMIE@solixinc.com](mailto:DCROMIE@solixinc.com)> 3/21/2008 2:48:58 PM >>>  
Hi Ms. Stewart

Just letting you know I got the app through. It's OK..

Donna M. Cromie  
Program Integrity Assurance  
Schools & Libraries Division  
Universal Service Administrative Company  
Phone: 973-581-5042  
Fax: 973-599-6522  
Email: [DCromie@sl.universalservice.org](mailto:DCromie@sl.universalservice.org)

-----Original Message-----

From: Brenda Stewart [<mailto:Brenda.J.Stewart@illinois.gov>]  
Sent: Friday, March 21, 2008 11:11 AM  
To: Cromie, Donna  
Subject: Re: Erate 7Day App#619896 ILLINOIS SCHOOL FOR THE VISUALIMPAIRED

Hello Ms. Cromie,  
Please find my Item 21 Attachment. As you will see, the Project Grand Total is a different amount that I had submitted in our Form 471. I would ask that you adjust our FRN to the amount shown in the attachment provided with this message. Certainly if you have any additional questions, please do not hesitate to email me as I will be out of the office on 3/24, 3/25, and 3/26. I will be back at school on 3/27.

If you would be so kind as to email me back upon your receipt of this email so I will know you have received my Item 21 Attachment.

Thank you!  
Brenda Stewart

Brenda Stewart  
Technology Specialist  
LAN & RAC-F Coordinator  
Illinois School for the Visually Impaired  
658 East State Street  
Jacksonville, IL 62650  
[brenda.j.stewart@illinois.gov](mailto:brenda.j.stewart@illinois.gov)  
Web Site: [www.isvi.net](http://www.isvi.net)  
(217) 479-4428  
TTY: (217) 479-4415  
FAX 217.479.4412  
WCS #: 444-72-001-XB-1

**CONFIDENTIALITY NOTICE:**

The content in this e-mail and any files or attachments transmitted with it are confidential and may be protected by legal privilege. This e-mail is intended for the use of the individual or entity to whom this e-mail is addressed. If you are not the intended recipient of this e-mail, you are hereby notified any use, dissemination, distribution or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately by e-mail and delete this e-mail from your system.

>>> "Cromie, Donna" <[DCROMIE@solixinc.com](mailto:DCROMIE@solixinc.com)> 3/19/2008 12:40:40 PM >>>  
I know you're working on this. Reminder that I have to send ok.

---

Mar 19, 2008  
Brenda Stewart  
ILLINOIS SCHOOL FOR THE VISUAL IMPAIRED  
Telephone: (217) 4794400  
Application Number: 619896  
Response Due Date: 3/26/2008

You were recently sent a written request for additional information needed by the Program Integrity Assurance (PIA) team to review your Funding Year 2008 Form 471 application to ensure that it is in compliance with the rules of the Universal Service program. This is a reminder that the response due date is approaching. To date, none of the requested information has been received.

The information needed to complete the review is listed below.

ITEM I: Item 21 Attachment UNIT total was incorrect.

On FRN #152587, you requested \$201,080.42..

The documentation you submitted Total Unit Cost column = \$203,061.00



not your total of \$24,4047.79.

You then removed \$42,967.37 for Datacomm State Service discount.

\$203,061.00(correct unit total) minus \$42,967.37(Datacomm State Service discount) =  
\$160,093.63

\$160,093.63 minus the ineligible RSI Call Accounting Package of \$4943.00 = \$155,150.63

FRN amount will be reduced to \$155,150.63

Please confirm if you agree with the cost allocation. If you do not agree with the cost allocation that we have produced, you must provide an alternative cost allocation identifying the cost(s) for the ineligible item(s).

Agree with the cost allocation: \_\_\_\_\_

Do not agree with the cost allocation: \_\_\_\_\_

If you do not respond within 15 days, the FRN will be modified to remove the ineligible items

For further information, see "Cost Allocation Guidelines for Products and Services" located in the Reference Area of the SLD Web site at:

<http://www.universalservice.org/sl/applicants/step06/cost-allocation-gui>

[delines-products-services.aspx](#)

<<http://www.universalservice.org/sl/applicants/step06/cost-allocation-gu>

[idelines-products-services.aspx](#)> .

Please fax or email the requested information to my attention. If you have any questions or if you require a further explanation of this request, please feel free to contact me.

It is important that we receive all of the information requested so the PIA team can complete its review. Please fax or email the requested information to my attention. If you have any questions, do not understand what we are requesting, or feel that you have already responded, please feel free to contact me.

If we do not receive the requested information by 3/26/2008, your application(s) will be reviewed using the information currently on file. Failure to respond may result in a reduction or denial of funding.

Should you wish to cancel your Form 471 application, or any of your individual funding requests, please clearly indicate in your response that it is your intention to cancel an application or funding request(s); along with the Form 471 application number(s) and/or funding request number(s), and the complete name, title and signature of the authorized individual.

A copy of this correspondence is being forwarded to your State E-Rate Coordinator for informational purposes only.

Thank you for your cooperation and continued support of the Universal Service Program.

Donna M. Cromie  
Program Integrity Assurance  
Schools & Libraries Division  
Universal Service Administrative Company  
Phone: 973-581-5042  
Fax: 973-599-6522  
Email: [DCromie@sl.universalservice.org](mailto:DCromie@sl.universalservice.org)

---

Confidentiality Notice: The information in this e-mail and any attachments thereto is intended for the named recipient(s) only. This e-mail, including any attachments, may contain information that is privileged and confidential and subject to legal restrictions and penalties regarding its unauthorized disclosure or other use. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action or inaction in reliance on the contents of this e-mail and any of its attachments is **STRICTLY PROHIBITED**. If you have received this e-mail in error, please immediately notify the sender via return e-mail; delete this e-mail and all attachments from your e-mail system and your computer system and network; and destroy any paper copies you may have in your possession. Thank you for your cooperation.

## **Attachment #2**

# Form 471 - Item 21 Attachment

Illinois School for the Visually Impaired

Attachment # - Telecom Project

Billed Entity Number (BEN) - 73153

Form 471 Application # 619896

Quantity	Product or Service Description	Unit Cost	Total Unit Cost	Extended Pre-discount Cost		Extended Ineligible Pre-discount Cost	
				Eligible Recurring	Eligible Non-Recurring	Ineligible Recurring Cost	Ineligible Non-recurring Cost
1	Nortel PBX System Option 11C	\$81527.00	\$81527.00				
1	Pilot 6 Port Voice Mail	\$25,502.00	\$25,502.00				
1	Nortel T-1 Card Dual	\$6,143.00	\$6,143.00				
1	Remote Maintenance Capability	\$1,120.00	\$1,120.00				
7	Nortel Digital Station Card	\$1,840.32	\$12,882.24				
1	Nortel power fail transfer unit	507.74	507.74				
1	Nortel Signaling Server	\$4,950.00	\$4,950.00				
1	Nortel Media Card	\$4,072.50	\$4,072.50				
2	Adtran T1 ESF CSU Ace W/PS I	\$936.00	\$1,872.00				
1	Nortel 325-24T Ethernet Switch	\$624.10	\$624.10				
1	RSI Call Accounting Package	\$4,943.00					\$4,943.00

Quantity	Product or Service Description	Unit Cost	Total Unit Cost	Extended Pre-discount Cost		Extended Ineligible Pre-discount Cost	
				Eligible Recurring	Eligible Non-Recurring	Ineligible Recurring Cost	Ineligible Non-recurring Cost
1	TrippLite 1 Hr. UPS	\$2,043.66	\$2,043.66				
144	Labor to Install PBX	\$60.99	\$8,782.56				
116	Install Systimax Cat-3 wiring-4 pr	\$182.14	\$21,128.24				
400	Install Systimax Cat-3 wiring-25 pr	\$1.35	\$540.00				
2900	Install Systimax Cat-3 wiring-50 pr	\$0.88	\$2,552.00				
1500	Install Systimax Cat-3 wiring 100 pr	\$3.78	\$5,670.00				
500	Install Systimax Cat-3 wiring 300 pr	\$3.78	\$1,890.00				
1000	Install Systimax 4CIS Fuses	\$5.13	\$5,130.00				
2	Install Systimax Bldg Entrance protection 25 pr	\$319.76	\$639.52				
6	Install Systimax Bldg Entrance protection 50 pr	\$389.34	\$2,336.04				
6	Install Systimax Bldg Entrance protection 100 pr	\$655.84	\$3,935.04				
9	Install Systimax 100 pr Block kit	\$37.41	\$336.69				

Quantity	Product or Service Description	Unit Cost	Total Unit Cost	Extended Pre-discount Cost		Extended Ineligible Pre-discount Cost	
				Eligible Recurring	Eligible Non-Recurring	Ineligible Recurring Cost	Ineligible Non-recurring Cost
1	Install Systimax 300 pr Block kit w/C4's	\$109.13	\$109.13				
1	Install Systimax 300 pr Block kit w/C5's	\$107.66	\$107.66				
600	Install 2 Conduits of 300' each of 2" HDPE	\$5,469.00	\$10,938.00				
4	Drill 2" holes in tunnel wall	\$34.50	\$138.00				
533	Install Cabling Labor (Regular Time)	\$60.99	\$32,507.67				
12	PBX System Maintenance	\$484.98		\$5,819.76			
Labor & Materials Total			\$237,984.79				
SBC Global Services - Datacomm State Service Discount			\$42,973.19				
Project Grand Total			\$195,011.60	\$5,819.76			\$4,943.00

## **Attachment #3**

**E-RATE CENTRAL**Dedicated to Simplifying  
the E-rate Program for  
*Schools, Libraries and Vendors***Home****Services****Application  
Tips****Forms  
Rack****State  
Information****Service  
Provider****Resources  
& Archives****Contact Us**

Thursday, October 16, 2008

**FRN: 1752587****FY: 2008****Basic Information**

**Applicant:** ILLINOIS SCHOOL FOR THE VISUAL IMPAIRED **Type:** SCHOOL  
**BEN:** 73153

**470 Information**

**470#:** 491350000662094

**471 Information**

**471#:** 619896  
**SPIN:** 143004812 SBC Datacomm, Inc.  
**Service Type:** INTERNAL CONNECTIONS  
**Status:** FUNDED **FCDL Date:** 7/16/2008  
**Wave:** 13

**Status Memo:** MR1: The FRN was modified from Onetime charge of \$201,080.42 to \$19,501.16 to agree with the applicant documentation. <><><><><><>  
 MR2: The FRN was modified from monthly charge of \$365.40 to \$484.98 a month to agree with the applicant documentation.

**Service Start Date (471):** 7/1/2008 **Service Start Date (486):**  
**Committed Amount:** \$22,788.83 **Payment Mode:** NOT SET  
**Disbursed Amount:\*** **Undisbursed:**  
**Last Date of Service:** **Last Date to Invoice:** 1/27/2010

	<b>Original Request</b>	<b>Committed Request</b>
Total Monthly Cost:	\$365.40	\$484.98
Total Ineligible Monthly Cost	\$0.00	\$0.00
Months of Service:	12	12
Annual Recurring Charges:	\$4,384.80	\$5,819.76
Estimated One Time Cost:	\$201,080.42	\$19,501.16
Total One Time Ineligible Cost:	\$0.00	\$0.00



Total One Time Cost:	\$201,080.42	\$19,501.16
Estimated Monthly Cost:	\$365.40	\$484.98
Estimated Annual Cost:	\$205,465.22	\$25,320.92
Discount Percent:	90 %	90 %
Requested Amount:	\$184,918.70	\$22,788.83

[Last Update: 10/15/2008]

**Privacy Policy | Disclaimer**  
© 1998-2008 **CentralEd**™ All Rights  
Reserved